

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

KARINA BIBICHEFF,

Plaintiff,

v.

PAYPAL INC.,

Defendant.

Case No. 17-CV-4679 (DRH) (AYS)

**DEFENDANT PAYPAL, INC.'S NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon the Memorandum of Law in Support of its Motion to Dismiss, served contemporaneously with this Notice, and such further evidence and argument as the Court may permit, Defendant PayPal, Inc. ("PayPal") shall move before the Honorable Denis R. Hurley, United States District Court Judge for the Eastern District of New York, at the Courthouse located at 100 Federal Plaza, Central Islip, New York 11722, on August 28, 2019, or as soon thereafter as counsel may be heard, for an Order dismissing the claims against PayPal in the above-captioned action pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted.

Pursuant to the briefing schedule directed by the Court, Plaintiff's opposing papers, if any, shall be served on or before August 14, 2019. PayPal's reply papers in further support of its motion, if any, shall be served on or before August 28, 2019.

Dated: July 24, 2019

Respectfully Submitted,

By: /s/ Archis A. Parasharami

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